ALSTON&BIRD LLP

One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424

404-881-7000
Fax:404-881-7777
www.alston.com

Lee A. DeHihns, III **Direct Dial: 404-881-7151** **E-mail: lee.dehihns@alston.com**

September 2, 2009

Michael Hom, Environmental Engineer
Clean Water Enforcement Branch
Water Protection Division
U.S. EPA Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

Re: Comments on Drinking Water Well Survey Protocol and Groundwater and Soil Data and Update on Other Items

Dear Mr. Hom:

Enclosed with this letter is the response of Dalton Utilities to your August 20, 2009, email request addressed to Mr. Don Cope, President and CEO of Dalton Utilities concerning EPA's comments on Dalton Utilities Drinking Water Well Survey Protocol and Groundwater and Soil Data. The enclosures are a September 2, 2009 letter with Attachments.

Please contact me if have any questions.

Sincerely,

Lee A. DeHihns, III

LAD:gba
Enclosures

LEGAL01/13110542v5

Dalton
UTILITIES

September 2, 2009

Mr. Michael Hom, Environmental Engineer
Clean Water Enforcement Branch
Water Protection Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: Comments on Drinking Water Well Survey Protocol and Groundwater and Soil Data and Update on Other Items

Dear Mr. Hom,

Dalton Utilities has received and reviewed the comments on the Drinking Water Well Survey Protocol and Groundwater and Soils Data attached in your email dated August 20, 2009. For clarity, the pertinent comments are listed below in plain text with Dalton Utilities responses following in italics.

In regards to the Information Needed to Evaluate Groundwater and Soils Data at Dalton Utilities Loopers Bend Facility:

For the monitoring wells where the groundwater samples were collected, EPA should request DU provide additional information. The following items are critical: the ground surface elevation, the depth to water encountered during drilling, the depth to standing water, soil/rock description, total well depth, the length of casing, the depth of casing below ground surface, sample interval, the type of backfill used during well construction (if any).

Most of this information is contained in the record of installation for each monitoring well. The records of installation are attached herein as Attachment A.

Additional items that may be useful in helping to evaluate the sample date includes: the hole diameter, the type of drilling equipment, information regarding the type of drilling fluid used, any gain or loss of fluid during drilling, any unusual borehole conditions noted during drilling, any cavities or voids encountered during drilling, any changes in color in formation samples or fluid encountered while drilling, the type of casing used in the well, the diameter of casing, how casing sections were joined, if there is an end cap on the

casing, the screen material (if any), the screen diameter, the slot size and length, the depth of the top and bottom of the screen, the type and size of filter pack (if any), the volume of filter pack emplaced, the source of filter pack, the method of filter pack emplacement, the grout composition, the method of grout emplacement, the volume of grout emplaced, the top and bottom of the grouted interval, the type of backfill used (if any), the depth and top of any backfill, they type of surface seal, the depth of surface seal, the method of well development, the date and time of well development, the volume and source of water used in well development.

Where this information was available, it is contained in the record of installation for each monitoring well. The records of installation are attached herein as Attachment A.

For surface soils, EPA should request that DU provide: the depth of the sample, the method of sample collection (i.e. grab vs. composite), the type of equipment used in sample collection, a visual description of the soil (if noted), any notation of unusual sampling conditions, and the rationale for the selection of sample locations. In addition, it would be helpful to explain how the samples collected would be representative of the site.

The soil samples were collected in accordance with the methodology and sample locations stipulated in our LAS permit and illustrate each of the major soil series within the sprayfield areas. To summarize this methodology, the samples are grab samples collected after the removal of the humus and top soil material and consist of the first 4 – 6 inches of soil. A standard shovel is used and the material is placed into a sample container manually upon collection.

The sample locations were selected based on the locations where we currently collect soil samples per our LAS permit as instructed by EPA's Section 308 information request dated May 20, 2009, and represent the major soil series within the sprayfield areas.

In addition, it would be useful if DU could provide a map of the facility which depicted the location of samples collected. The map should include the effluent spray heads, locations of compost piles, buildings, impoundments, and natural surface water.

We have already submitted a map illustrating the sample locations and corresponding GPS coordinates; however, as requested, we have attached a map that overlays all of the indicated items relative to the sampling locations (see Attachment B).

<u>In regards to Dalton Utilities Drinking Water Well Survey Protocol Deficiencies:</u>

<u>Area Proposed for Survey Insufficient</u>

Dalton Utilities (DU) has proposed to sample wells at residences which are "potentially hydrologically downstream" [sic] from the Loopers Bend facility based on unidentified "publicly available maps and records." Data and information has not been presented to indicate which areas DU considers to be downgradient and are proposed for being

surveyed and sampled. Georgia Geologic Survey Publications (Information Circular 47 and Bulletin 91) indicate the Loopers Bend facility is located on a member of the Conasauga Group which is composed mostly of shale. Groundwater is indicated to be found primarily in fractures in the shale. Thus DU's assumption that groundwater flow is downgradient may sometimes be inaccurate due to the nature of the geologic setting of this area.

Dalton Utilities evaluated the subsurface hydrology of the site and surrounding area from information and records obtained during the installation of the groundwater monitoring wells on the Land Application System (LAS) including potentiometric contour maps as well as the routine water level data gathered monthly by Dalton Utilities as part of the monitoring well sampling which was used to confirm the potentiometric contours. Using this information, Dalton Utilities started the well survey in areas deemed to be downgradient and in areas where it was questionable as to the availability of public drinking water.

From this information, it was determined that the groundwater to the south and southeast of the LAS had the highest potential of impact or influence. Additionally, public water was not known to be available in some of these areas as it is known to be available in the remainder of the area surrounding the LAS property. As such, Dalton Utilities began the well survey in this vicinity.

In addition, DU has proposed to identify only the residences which are immediately adjacent to the facility. The impacts from PFC may extend beyond the area immediately beyond the facility boundary.

The well survey has not been restricted to only the residences immediately adjacent to the LAS. The survey began with the residences determined to most likely be hydrologically downgradient from and adjacent to the LAS. Ultimately, the well survey has been designed to test all residential locations that use a well for potable water in a one mile radius around the LAS property boundary. A map illustrating all the roads in the one mile radius which are included in the drinking water well survey is attached as Attachment C.

In other perfluorinated compound (PFC) sites in Region 4, the area for sampling has been a set distance in *all* directions from the facility. The distance used for drinking water well surveys typically ranges from two to five miles from the facility in this region. Dalton should revise the survey area to include a fixed distance in all directions from the Loopers Bend Facility. This revision will ensure that the survey adequate addresses uncertainties due to the geologic setting of this area.

The well survey is being conducted for all locations within a one mile radius of the LAS property boundary similar to the approach EPA used in Decatur, Alabama. If evidence of elevated levels of PFCs is identified in wells within the one mile radius, then the radius will be adjusted as appropriate.

Procedure for Identifying Residences is Inadequate

DU has proposed to cross reference addresses which are publicly available with those from public drinking water systems. The source of DU proposed information is vague and may not be sufficient. At other sites where well surveys have occurred additional information and data such as recent images, historic satellite photos, tax data, and various local and state records have been searched to create a comprehensive data base to use to cross reference with information from public water supply systems. It is particularly important to make extensive use of tax records should be used to identify tracts where homes are likely to exist. DU should upgrade the development of the lists of residents to be sufficiently comprehensive to ensure that reasonable efforts to located residences which may have water supply wells are conducted.

Information on the residences for the drinking water well survey was obtained using the most current publication of the Polk City Directory, a comprehensive city directory and demographic publication of the large database company InfoUSA. The Polk City Directory lists all addresses and residences by road name. In addition, Dalton Utilities used our internal geographic information system (GIS) mapping system and the Murray County GIS system which has streets, homes, and backgrounds illustrated. These lists of residential locations by road name were then confirmed and corrected using actual field surveys of each and every road. The list of homes in a one mile radius from the LAS border was compiled and cross checked against Dalton Utilities drinking water customer database in addition to the other public drinking water systems in the area. Any location not shown to have public drinking water was compiled. These addresses were then contacted to verify if the location utilizes a private drinking water well. If a well was present, sampling of the well was offered to the resident.

Residential Notification Procedures

DU has proposed contacting residences by making telephone calls. Many residents may not be home due to work and other commitments. Others may not answer phone calls except for recognized numbers. Some may mistake a phone call of this type as a sales call. Some residents will have unlisted numbers. It is too difficult to reach many people by phone to depend on this approach. A visit to each residence believed to use a private well is indispensible. In the event no one is home, there should be an informational pamphlet that can be left with contact information. At least one follow-up home visit should be made for the residences where no one answers the door. It is recommended that contact be made with each residence during late afternoon and early evening during the weekday or during Saturday to ensure that every residence is adequately informed about this issue.

Dalton Utilities makes every effort to contact each residence and does not stop until the resident has been contacted to confirm the presence of a drinking water well or public water system connection. The survey is being conducted at varying hours to ensure contact of residents that are not home during standard business hours. The survey is also

being conducted door-to-door with multiple visits for locations where no one is home during previous site visits.

Information and Data for Residents

For the residents that agree to a site visit, DU proposes to provide only the FAQ section of PFCs from the EPA website. While the FAQ website is a good resource, it is general in nature and does not address any specific issues for the Loopers Bend area. It is recommended that DU develop a site specific informational handout. A written questionnaire is also needed to ensure that all important information is collected. It is recommended that a written consent form for sampling be used. It is important that an adult be present to provide permission for sampling. At each residence the information should be reviewed in detail, the questionnaire should be filled out, and the consent formed signed, if they are willing to sign.

Dalton Utilities recently issued a press release to the local media to provide information to local citizens on specific issues for the Looper's Bend area (see Attachment D). Dalton Utilities does not believe there is enough information specific to the Looper's Bend area at this time to develop additional detailed handouts. Follow up information will be developed and provided to the residents as appropriate based on the results of the private well sample analyses.

Residents are questioned as to the source of potable water utilized by the individuals and recorded during the well survey. If a private well is the location's potable water source, the resident is asked if it is permissible to sample the well. Once verbal permission is given to sample the well, the sample is collected and analyzed in accordance with the sampling plan.

In this case, the use of a written consent form would likely result in undue fear and speculation and deter the residents from granting permission to obtain the well samples. Verbal permission from an adult residing in the home is obtained and noted for each of the locations where samples are collected. Any residents that refuse well testing will be noted in the well survey report as well.

DU proposed to collect only a GPS reading for each residence. The GPS reading is great but it will not provide information about the setting of the water supply well. A sketch of each residential property which depicts the property boundary, the well, the home along with the street location and any other important features is recommended.

The Global Positing System (GPS) coordinates collected in the field at the sample locations are uploaded to our internal Geographic Information System (GIS) mapping system which already has backgrounds including streets and homes illustrated. The property boundaries, if necessary, can easily be obtained from the respective county's GIS system and overlaid with the respective locations.

In the event the resident refuses to grant permission for sampling, documentation should also be provided. If possible a signature should be obtained for rejection of sampling, if possible.

Thus far, none have refused sampling; however, internal documentation will be maintained if this situation occurs.

Sampling and Collection of PFCs

Occasionally, water supply may be from a spring or other surface water source. The sampling plan should include this contingency and explain how the samples will be collected.

Dalton Utilities will amend the sampling plan appropriately in the event this situation occurs. We do not expect to encounter this situation in the well survey and, therefore, did not include this unlikely scenario in our original plan.

The protocol does not include any discussion regarding a sampling log or documentation and labeling of sampling bottles or chain of custody forms.

The sample bottle labels and corresponding chain of custody forms are being filled out according to our standard sampling procedures and reflect the addresses where the samples were collected for simplicity and clarity.

There is also no discussion of duplicate samples and trip blank samples.

Duplicate samples and trip blanks are also being collected and analyzed. The results of these analyses will be included in the well survey report. These samples are being collected and analyzed at a rate of at least 10% of the total samples.

DU should complete the sampling protocol and explain how surface water samples, if needed, will be collected. They protocol also should include a discussion regarding the sampling log, documentation and labeling of sample bottles and chain of custody forms. QAQC issues such as duplicate samples and trip bland samples should be discussed.

As it is unlikely that surface water samples will be needed, it was not included in the sampling plan. If it is needed, the sampling plan will be appropriately amended.

The sampling information, sample bottle labeling, and chain of custody forms are being completed according to standard sampling procedures with the samples being labeled to reflect the addresses for simplicity and clarity. Additionally, duplicate samples and trip blanks are being collected and analyzed.

Analysis of Well Survey Data

There is a discussion regarding analytical data which included mention of detection limits for PFOA and PFOS but does not specify these limits. The detection limits for all compounds proposed for analysis should be specified.

The method detection limit for aqueous samples analyzed for Perfluorooctanoic Acid (PFOA) is 0.0055 micrograms per liter (ug/l) or parts per billion (ppb) and the reporting limit is 0.020 ug/l. The method detection limit for aqueous samples analyzed for Perfluorooctane Sulfonate (PFOS) is 0.0068 ug/l and reporting limit 0.020 ug/l. These limits are shown in the analytical reports from the contract laboratory.

In addition to PFOA and PFOS, the private well samples are being analyzed for the list of PFCs as indicated in the sampling protocol submitted to you as Attachment E to our correspondence dated August 5, 2009. The method detection limits and reporting limits for all these compounds are shown in Attachment E to this letter.

Occasionally, the laboratory is not able to follow a method due to a technical issue. In this event DU should provide a copy of the method used for the analysis and a narrative regarding why departure from the method was necessary.

This is documented in the contract laboratory's analytical report case narrative.

In the event a well is above the detection limit but below the EPA provisional health advisory or compounds are detected for which there are not currently health-based limits, DU should propose what additional steps will be taken. These steps should at least include additional quarterly sampling for up to two years to help determine if the concentrations in the well are stable, decreasing, or increasing.

Dalton Utilities noted in our sampling plan that if this case occurs, Dalton Utilities would seek input from EPA. If the results in consultation with EPA for any wells warrant additional sampling, Dalton Utilities will propose to perform that sampling. If sample results are above reporting limit, Dalton Utilities would propose to sample quarterly in accordance with the same procedures implemented in Decatur, Alabama, to determine any fluctuation in concentrations. In Decatur, EPA has proposed to allow sampling to stop after 4 quarters if concentrations are still below the public health advisory and no other related compounds are present in significant concentrations.

Documentation and Reports

DU has proposed only a final report. However, the effort required is likely to take several months and monthly interim reports should be provided to EPA and EPD to document adequate progress is being made.

Dalton Utilities has already visited approximately 221 residences out of an estimated 350 to 400 residences meeting the criteria for visits, sampled 48 wells, and completed field surveys on 43 out of 89 roads. We anticipate completing the drinking water well survey

by the end of September 2009. Additionally, a final report will be provided to EPA and EPD once all the data is received from the contract laboratory.

Also, the final report should include all data and information collected to date. It should include the door to door survey results, a summary of well sampling activities, including names and addresses and GPS locations, sample logs, laboratory analytical results.

All the pertinent information from the well survey will be compiled and submitted to EPA and EPD.

To date, all of the preliminary results received for private wells around the LAS have been below the public health advisory (with most below the detection limit) except for one sample. Dalton Utilities has already collected another sample from this private well to confirm the results. Dalton Utilities is working to either provide for treatment of the well or connect the residence to public drinking water in accordance with our sampling protocol submitted to you as Attachment E of our August 5, 2009, correspondence.

In response to EPA's request during the August 25, 2009, conference call, Dalton Utilities is gathering additional information on the distribution of the finished compost. To date, Dalton Utilities has contacted all the large volume distributors shown in Attachment F, and approximately 40% of the individuals that received the final compost for which we have contact information as shown in Attachment G. Use of the compost by Dalton Utilities is shown in Attachment H.

It appears that the majority of the large volume distributors further distributed the finished compost to landscape supply companies where the compost was then sold as retail. Dalton Utilities, however, is continuing to track and evaluate records to determine the last known distribution point for each of these distributors based on their available records. For the individual recipients of the finished composted, the majority used the product as a soil amendment and only four were found to utilize a private well for drinking water. Samples of the private drinking water wells at these four residential locations are being collected and analyzed in the same manner as samples for the drinking water well survey. We will advise you of the results from our inquiry into the distribution of the finished compost as we proceed. Dalton Utilities anticipates providing another updated report on these contacts and records reviews by the end of September 2009.

Dalton Utilities is aware of multiple studies which have identified the potential for fluorotelomer alcohols (FTOHs) to breakdown under aerobic conditions both in wastewater treatment plants and in soil into PFOA. As such, we have added FTOHs to the list of compounds for which to monitor as a part of our plan for assessing current operations with the Sustainability Division of the Georgia Department of Natural Resources (DNR).

Additionally, as stated in our correspondence dated August 5, 2009, Dalton Utilities will provide the analytical report for the modified Toxicity Characteristic Leaching Potential (TCLP) tests as soon as the final lab report is available.

The analytical report for the influent, or untreated wastewater samples, from each of our wastewater treatment plants collected as a part of the potential source assessment of our wastewater collection system will be provided as soon as it is available. The preliminary results indicate that the concentrations of PFOA and PFOS are below the US EPA Public Health Advisory levels for drinking water which further validates the report from industry that they have ceased using PFOA based chemistry.

Going forward, Dalton Utilities will sample the composting operation, the influent and the effluent to the three wastewater treatment plants on a monthly basis to determine the ongoing status of PFCs in our wastewater system. As concentrations in the influent, effluent and sludge decrease further, we will run additional modified TCLPs to support the fact that the current composting operation will result in a finished material that does not pose the threat of leaching PFOA and PFOS above the public health advisory.

Additionally, Dalton Utilities, as part of the partnership with the Sustainability Division of the DNR, will be meeting with representatives of the University of Georgia (UGA) to define the scope of the project to evaluate the current usage and potential levels going forward of perfluoridated chemicals (PFCs) in the industrial discharges into our wastewater collection system. The meeting is scheduled to occur on September 17, 2009. Updates on this project will be forthcoming as we proceed.

Further, as noted in our correspondence dated July 20, 2009, Dalton Utilities has had discussions with the Supervisor for Game Management in the Northwest Georgia Region of the DNR to identify potential partners. We have also talked with officials at the United States Department of Agriculture Wildlife Services in an effort to collaborate with these organizations on forming a plan to obtain and analyze blood and tissue samples of the deer and turkey to determine if any consumption guidelines are warranted.

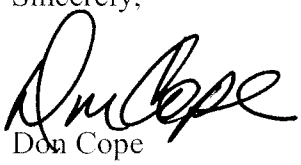
As there are no EPA public health advisories or consumption guidelines, however, regarding the ingestion of deer and turkey meat or any other food items in relation to PFCs, Dalton Utilities requests EPA to study these toxicological effects and advise Dalton Utilities of the findings.

Until such time that consumption guidelines are available from an EPA study or through Dalton Utilities' partnership with DNR, Dalton Utilities will restrict the human consumption of meat obtained through the hunting operations on Dalton Utilities Land Application System. Hunters will be allowed to keep only the components of the wildlife to be used as trophies.

As always, Dalton Utilities will update you as the projects discussed with you proceed. If you have any questions, please contact me at 706-529-1091 or dcope@dutil.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Don Cope
President & CEO

Attachments (8)

C: Dr. Carol Couch, Georgia Environmental Protection Division (cover letter only)
Dr. Marlin Gottschalk, Sustainability Division Georgia Department of Natural Resources (cover letter only)
Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only)
Lee A. DeHihns, Esq.

Dalton
UTILITIES

July 30, 2009

FOR IMMEDIATE RELEASE:

Early this year, the Environmental Protection Agency (EPA) published provisional health advisories for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) for drinking water. These chemicals have been used nationwide in a broad range of applications. They are used in developing non-penetrable membranes that are applied to food containers and packaging, clothing and other outdoor apparel and equipment and stain-resistant applications for textiles and fabrics. They have been utilized within the carpet industry to apply stain resistance.

These provisional health advisories are set at an extremely low level that, until recently, would have been non-detectable by the methods used to measure these chemicals. There is no limit nor regulation associated with the use of these chemicals. It should also be noted that these health advisories are for drinking water and that there are no levels nor advisories associated with wastewater, wastewater treatment, surface water or soils.

Prior to setting the provisional health advisory, Dalton Utilities had not sampled for these chemicals. Since the health advisory was established, the EPA has sampled the Dalton drinking water supply and treated drinking water from all of our drinking water treatment plants. Dalton Utilities was informed this week that the samples EPA took of our drinking water supply and at our drinking water treatment plant indicated non-detectable levels of these chemicals.

Additionally, Dalton Utilities has sampled our wastewater operations. In the samples Dalton Utilities has taken of its wastewater operations, it has been determined that there is evidence of both chemicals. It should be noted that the levels of detection in these samples are extremely low. In fact, there are only three laboratories that EPA recommends for this type of testing. These laboratories are located in Canada, Pennsylvania and Colorado.

Dalton Utilities' testing indicates that the carpet industry has stopped using or significantly reduced their use of these chemicals, which confirms what industry has indicated to Dalton Utilities. There is some detectable level in the influent wastestream; however, these levels are below the drinking water health advisory levels and likely indicate that they are coming from residuals in the wastewater collection system from previous use.

Additionally, our samples indicate that there are levels above the drinking water health advisory in some of the monitoring wells on our Land Application System (LAS) site, and there are higher levels in our older compost than there are in compost recently produced from our wastewater operations. It should be noted that neither of these occurrences has created levels of PFOA in the Conasauga River above the drinking water advisory level.

Dalton Utilities is instituting a program in partnership with the Georgia Department of Natural Resources' Sustainability Division and our customers who have utilized these products in the past to insure that they are no longer being used and to determine if further action is required resulting from past usage. We will also be providing EPA a list of individuals or companies who have been provided compost. Additionally, we will be conducting testing on groundwater based on private drinking water well surveys outside and around the LAS to determine if there is any level of the chemicals in these areas.

####

Perfluoridated Compounds for Analyses

Compound	Acronym	Reporting Limit (RL) ug/l	Method Detection Limit (MDL) ug/l
Perfluorobutanoic acid	C4	0.02	0.0062
Perfluoropentanoic acid	C5	0.03	0.0082
Perfluorohexanoic acid	C6	0.02	0.0030
Perfluoroheptanoic acid	C7	0.02	0.0054
Perfluorooctanoic acid	C8 / PFOA	0.02	0.0055
Perfluorononanoic acid	C9	0.02	0.0065
Perfluorodecanoic acid	C10	0.02	0.0026
Perfluoroundecanoic acid	C11	0.02	0.0025
Perfluorododecanoic acid	C12	0.02	0.0040
Perfluorotridecanoic acid	C13	0.02	0.0072
Perfluorotetradecanoic acid	C14	0.02	0.0087
Perfluorobutane sulfonate	PFBS	0.02	0.0045
Perfluorohexane sulfonate	PFHxS	0.03	0.0084
Perfluorooctane sulfonate	PFOS	0.02	0.0068
Perfluoroctane sulfonamide	PFOSA	0.05	0.0057

Compost Manifest Log - Users Greater than 2,000,000 pounds

Transporter Name	Transported To	General Uses	Street Address	City	State	Zip Code	Total Weight (lbs)	Date(s) Hauled Off Site
Autry Farms (hauling service)			352 West Watts Rd	Ringgold	GA	30736	14,656,000	9/30/05 - 6/11/09
	Beaty Fertilizer & Chemical Company	Nursery/Landscape supplier - sold as retail - Does not have individual records of who the compost was sold to.	PO Box 2516	Cleveland	TN	37320	5,250,000	
	Hwy 71 Landscaping & Supply Co.	Landscape supplier - sold compost to homeowners and landscape contractors.	3440 Cleveland Hwy	Dalton	GA	30720	1,100,000	
	Pro Lawn	Landscape supplier - sold compost to homeowners and landscape contractors.	1101 Mackey Avenue	Chattanooga	TN	37421	1,550,000	
	Show Place Homes	Used in construction of homes	Unknown				900,000	
	Turf Master Supply	Unknown	Unknown				800,000	
	Ooltewah Nursery	Unknown	Unknown				550,000	
	Reed Group	Unknown	Unknown				350,000	
	Redwood Hill	Unknown	Unknown				250,000	
	E H Landscaping	Unknown	Unknown				250,000	
	Circle H Garden Center	Unknown	Unknown				250,000	
	Kreed Construction	Unknown	Unknown				200,000	
	Rodney Laurance	Unknown	Unknown				150,000	
	Randy Wilhoit	Unknown	Unknown				100,000	
	Croxall	Unknown	Unknown				100,000	
	Windwood Bulk Co.	Unknown	Unknown				100,000	
	W D Scott Co.	Unknown	Unknown				100,000	
	Chatsworth Farm & Garden Supply	Unknown	624 N 4th Avenue	Chatsworth	GA		50,000	
	David Wright	Unknown	Unknown				50,000	
	Fine View Soils	Unknown	Unknown				50,000	
	Frand Reed	Unknown	Unknown				50,000	
	GreenScapes of Chattanooga	Unknown	Unknown				50,000	
	Harold Parrish	Unknown	Unknown				50,000	
	Hayduk Landscaping	Unknown	Unknown				50,000	
	John Gordy	Unknown	Unknown				50,000	
	John Snodgrass	Unknown	Unknown				50,000	
	Landscape Supply	Unknown	Unknown				50,000	
	Mountain Crest Landscape	Unknown	Unknown				50,000	
	Sandra Self	Unknown	Unknown				50,000	
	Tony Autry	Unknown	Unknown				50,000	
	Delivered to individuals.	No records					2,006,000	
Beaty Fertilizer & Chemical Company		Nursery/Landscape supplier - sold as retail - Does not have individual records.	PO Box 2516	Cleveland	TN	37320	3,214,000	11/15/05 - 5/29/09
Circle H Trucking		Bagged product shipped to home centers and sold as retail	746 River Street	Ellijay	GA	30540	5,811,000	2/23/05 - 6/3/09
Harvest Farms		Bagged product shipped to home centers and sold as retail	PO Box 40	Harrison	TN	37341	2,152,800	1/7/05 - 10/31/05
Jerrys Hauling		Yard landscape projects	Unknown				2,348,000	4/24/06 - 10/14/08

Compost Manifest Log - Users Greater than 2,000,000 pounds

Transporter Name	Transported To	General Uses	Street Address	City	State	Zip Code	Total Weight (lbs)	Date(s) Hauled Off Site
John Deere Landscaping		Landscape/Nursery supplier - sold to individuals, builders, landscape contractors for use in flower beds, around shrubs and trees. Did not sell for use on lawns. Individual records are business confidential.	650 Stephenson Hwy	Troy	MI	48083	2,450,000	3/31/06 - 10/22/08
Patterson Services		Mixed compost with 80% soil and sold to landscapers and contractors - did not keep individual records on where the compost was used.	5800 Riverview Road	Mableton	GA	30126	8,867,000	12/16/05 - 3/28/08
Shephard Mulch		Landscape supplier - sold as retail to homeowners and landscapers. Has no records of who it was sold to.	117 Roundnob Drive	Rocky Face	GA	30740	2,895,000	12/18/06 - 3/19/09
Lamar Shephard		Landscape supplier - sold as retail to homeowners and lansdcapers. Sold only for use on lawns and around trees. Does not have any individual records of who the compost was sold to.	695 1/2 N Varnell Rd	Tunnel Hill	GA		8,602,000	2/1/06 - 6/30/09
Weedon Trucking		Lawn landscaping suppliers - sold as retail.	317 Bells Ferry Rd.	Rome	GA		3,330,000	11/2/05 - 5/20/09

Compost Manifest Log - Individual Users

	Uses	On a Well for Drinking Water?	Street Address	City	State	Zip Code	Total Weight (lbs)	Date(s) Hauled Off Site
Betty Ann Clark			812 Atkinson Dr.	Dalton	GA	30720	1,100	4/29/09 - 4/30/09
Bianca Archuleta			107 E. Plantation St.	Chatsworth	GA	30705	1,000	3/23/09 - 4/6/09
Bill Mckenney	Flower beds, tilled in soil	No	1 Boys Mtn. Road	Ringgold	GA	30736	500	4/9/2009
Bill Russel							1,000	5/9/2005
Brent Dean							1,000	3/13/2008
Caleb Martin	Flower beds and vegetable garden, tilled in soil	No	241 Southern Circle	Chatsworth	GA	30705	500	4/2/2005
Carl Mashburn			2216 Decatur Pike	Athens	TN	37303		
Chad Garrison	Lawn, top dressed	No	1549 Dawnville Road	Dalton	GA	30721	10,000	2/24/2007
Chris Owens	Vegetable garden, tilled in soil	No	396 Dr Johnson Rd.	Crandall	GA	30711	9,060	1/25/07 - 3/9/07
Cims			North Goose Hill Lane	Rocky Face	GA	30740	1,000	4/24/2009
Dalton Utilities							1,774,300	6/8/05 - 6/30/09
Dan Findley	Flower beds, tilled in soil	No	449 Scarlett Dr	Dalton	GA	30721	1,000	4/20/2005
Darryl Williams	Lawn, top dressed	No	580 Reed Rd.	Dalton	GA	30720	5,500	3/22/08 - 4/18/09
David White/D.U.	Lawn - top dressed, flowers, vegetable garden - tilled in soil	No	1141 County Line Road	Resacca	GA	30735	2,000	2/13/2009
Don Cope	Flowers and vegetable containers	No	155 Enoch Trail	Rocky Face	GA	30740	150	
Donald Akers			4068 Keith valley Rd.	Cohutta	GA	30710	7,200	2/24/2006
Dr Hodges							430,000	9/24/08 - 10/28/08
Frank Kovach			910 Beaverdale Rd.	Dalton	GA	30721	1,000	6/6/09 - 6/8/09
Gary Hill	Lawn, tilled in soil	Yes	PO Box 342	Oakman	GA	30732	500	6/16/2009
Heath Brewster							5,000	3/23/2009
Individual (no names)							1,930,330	3/25/05 - 10/4/07
James Wilson	Vegetable garden and flowers, tilled in soil	No	3006 Davis Rd.	Rocky Face	GA	30740	126,000	1/15/2008
Jason Coleman	Lawn, top dressed	No					5,000	5/26/07 - 10/31/08
Jason Garland	Vegetable garden, tilled in soil	No	416 Hasty Drive	Tunnel Hill	GA	30755	200	4/24/2009
Jeff Cobb							28,800	2/2/2006
Jeff Fountian			2341 Gail Lane				3,600	3/9/2006
Jeff McNeely	Lawn - top dressed, flowers, vegetable garden - tilled in soil	No	3158 Morris Rd.	Rocky Face	GA	30740	20,000	4/29/05 - 6/10/07
Jenifer							1,000	4/9/2005

Jeremy Peden	Lawn - top dressed, vegetable garden - tilled in soil	No	34 Stone Brook Path	Chatsworth	GA	30705	48,500	10/11/06 - 4/26/09
Joe Stevens	Vegetable garden, tilled in soil	No	532 Wooten Rd.	Ringgold	GA	30736	700	3/6/2005
Joe Woody	Vegetable garden, tilled in soil	Yes	454 Jim Petty Rd.	Crandall	GA	30711	1,000	4/29/2005
John Burgess	Lawn, top dressed	No	624 Pine Oak Dr.				40,500	6/5/07 - 4/16/09
Johnny Davenport	Lawn, top dressed	No	3451 Cleveland Hwy	Dalton	GA	30721	267,000	6/1/06 - 6/8/06
Juan Montez			PO Box 236	Tunnel Hill	GA	30755	30,000	3/21/2009
Ken Finch	Flower beds, tilled in soil	No	2417 Shahan Dr.	Dalton	GA	30705	4,500	4/7/05 - 4/9/05
Ken Helton	Lawn, top dressed	No	3180 Helton Rd.	Rocky Face	GA	30740	1,000	2/18/2008
Larry Patton							50,750	4/5/07 - 4/29/08
Louis Dykes	Lawn - top dressed, flowers, vegetable garden - tilled in soil	No	145 Sahara Lane	Chatsworth	GA	30705	3,000	10/3/06 - 5/23/08
Marion Bryant			498 Palomino Drive	Dalton	GA	30720	1,500	4/9/09 - 5/13/09
Mark Hall	Lawn - top dressed, vegetable garden - tilled in soil	No	2742 Old Tilton Rd.	Dalton	GA	30720	1,000	3/4/2008
Mathew Warner	Vegetable garden, tilled in soil	No	194 Cotton Circle	Chatsworth	GA	30705	1,000	4/13/2005
McDaniel, Lori	Lawn, top dressed	No	1975 Highway 52E	Chatsworth	GA	30705	100,000	2/16/2006
Mickey Sisk			484 McCamy Rd	Chatsworth	GA	30705	42,500	10/18/06 - 3/25/07
Mike Croxall							2,000	5/27/08 - 5/28/08
Mike Marris							50,000	10/17/2008
Pat Camp							800	6/1/2007
Patsy Gordon			301 Nob North		GA		500	1/26/2009
Phillip H. Pheifer	Lawn, top dressed	No	41 Promise Heights Drive	Ringgold	GA	30736	525	4/2/09 - 5/22/09
Ralph England			PO Box 2095	Chatsworth	GA	30705	500	7/24/2005
Ray Sexton			923 Morgan Dr.	Tunnel Hill	GA	30755	1,500	9/26/08 - 4/16/09
Richard Dodson	Applied around trees	No	5460 Fredrick Rd.	Cohutta	GA	30710	500	4/20/2005
Robert Deforest	Lawn, top dressed	No	41 Promise Heights Drive	Ringgold	GA	30736	1,000	4/29/09 - 5/19/09
Robert Ledford	Flower beds, tilled in soil and top dressed	Yes	208 Mountain Trail	Lafayette	GA	30728	1,000	2/19/05 - 4/23/09
Rod Hensley			746 River Street	Ellijay	GA	30540	324,000	10/18/07 - 3/22/09
Russell Witherow			298 Katie Lane	Chatsworth	GA	30705	500	4/17/2009
Sid Abernathy			1504 Elaine Way	Dalton	GA	30720	1,000	4/27/09 - 5/15/09
Dustin Sharp			143 Ladd Springs	Cleveland	TN	37323	500	10/31/2008
Steve Bailey	Vegetable garden, top dressed	No	3906 Parker Rd.	Dalton	GA	30721	1,800	3/11/2007

Steve Bolles							200,000	4/7/08 - 4/28/08
Steve Bratton	Lawn and vegetable garden, top dressed	No	484 Bethany Rd.	Dalton	GA	30721	500	4/22/2009
Steve Thompson			1038 Jayis Way	Ringgold	GA	30736	100,000	3/20/07 - 3/27/07
Sue Dale	Lawn and Flower beds, top dressed	No	166 Skylark Dr.	Chatsworth	GA	30705	500	3/20/2009
Terry Earley	Lawn, top dressed	Yes	1095 Houston valley Rd.	Rocky Face	GA	30740	14,750	3/29/06 - 5/15/09
Terry Moody	Flower beds, top dressed	No	325 Woodbranch Dr.	Dalton	GA	30721	1,300	3/27/06 - 3/13/08
Tim Alexander							1,000	6/12/2006
Tim Jones							30,000	6/4/2007
Todd Hensley			5397 Willbanks Rd.	Chatsworth	GA	30705	1,000	3/19/2009
Tony Dale	Lawn and Flower beds, top dressed	No	166 Skylark Dr.	Chatsworth	GA	30705	3,500	3/13/09 - 3/23/09
Wade Hart	Lawn and Flower beds, top dressed	No	30 Arrowhead Dr.	Chatsworth	GA	30705	2,000	3/3/2005
Wally Babb			702 Furnance Creek	Lafayette	GA	30728	500	3/3/2005
William Earley	Lawn, top dressed, vegetable garden and flowerbeds tilled in	No	55 South Lake Dr.	Chatsworth	GA	30705	125,800	3/5/05 - 3/3/08
							5,826,665	

Compost Manifest Log - Dalton Utilities Uses

Transporter Name	General Uses	Street Address	City	State	Zip Code	Total Weight (lbs)	Date(s) Hauled Off Site
Dalton Utilities		1200 VD Parrott Pkwy	Dalton	GA	30722	1,774,300	6/8/05 - 6/30/09
Breakdown of Total	Soil amendment - LAS spray fields					1,364,000	
	Miscellaneous landscape projects - water plants and other DU facilities					242,650	
	Lawn repairs by water crews - various homeowners in Dalton/Whitfield Co					146,150	
	Erosion control and landscaping - Abutment WWTP					21,500	